

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M. Williams,  
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),  
Special Discovery Master

**DECLARATION OF SETH A. GOLDBERG**

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”), and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Cross Motion for Protective Order to Preclude the Production of Documents Withheld as Chinese State Secrets.

3. Attached to this Declaration as **Exhibit A** is a true and correct copy of a declaration executed by Yang Xueyu, a partner of Yun Zheng Law Firm.

4. Attached to this Declaration as **Exhibit B** is a true and correct copy of a letter dated March 23, 2021 sent from the ZHP Parties’ counsel to Plaintiffs’ counsel.

5. Attached to this Declaration as **Exhibit C** is a true and correct copy of the final transcript from the March 26, 2021 meet and confer.

6. Attached to this Declaration as **Exhibit D** is a true and correct copy of a letter dated April 1, 2021 sent from the ZHP Parties' counsel to Plaintiffs' counsel.

7. Attached to this Declaration as **Exhibit E** is a table listing the documents the ZHP Parties' have provided to Plaintiffs in redacted form.

8. Attached to this Declaration as **Exhibit F** is a table listing the documents the ZHP Parties' have withheld from Plaintiffs.

9. Attached to this Declaration as **Exhibit G** is a true and correct copy of Plaintiffs' Third Amended Set of Requests for Production of Documents to All API and Finished-Dose Manufacturing Defendants.

10. Attached to this Declaration as **Exhibit H** is a list of the custodial files collected in connection with the ZHP Parties' productions in this litigation.

11. Attached to this Declaration as **Exhibit I** is a true and correct copy of a letter dated April 24, 2021 from Plaintiffs' counsel to the ZHP Parties' counsel.

Executed on May 21, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg  
Seth A. Goldberg, Esq.  
Lead Counsel and Liaison  
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